REMARKS

Claims 1, 12, 14 and 25-28 have been amended. No claims have been added or cancelled. Thus, claims 1-28 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

Section 101 and 112 Rejections of claims 27 and 28:

The Examiner rejected claims 27 and 28 under 35 U.S.C. § 101 as being directed to non-statutory subject matter. The Examiner further rejected claims 27 and 28 under 35 U.S.C. § 112, first paragraph, as containing subject matter which was not described in the specification in such a way as to enable one skilled in the art to which it pertains, or with which it is most nearly connected, to make and/or use the invention. Applicants traverse these rejections. However, to expedite prosecution, claims 27 and 28 have been amended to recite a "computer-readable storage medium". Withdrawal of these rejections is respectfully requested.

Section 112, Second Paragraph, Rejection:

The Examiner rejected claims 1-7, 12 and 25-28 under 35 U.S.C. § 112, second paragraph as indefinite.

Regarding claim 1, the Examiner asserts that the phrase "computer executable code built in to said device" is unclear and "fails to qualify how code is 'built in' to a given, and what constitutes executable code being "built in" to an arbitrary device'. Applicants respectfully traverse this rejection and assert that claim 1, when read in light of Applicants' specification is clear and easily understood by one skilled in the art. However, to expedite prosecution, claims 1, 14 and 27 have been amended to recite that the pre-generated message interface is constructed prior to runtime. Removal of the section 112, second paragraph, rejection of these claims is respectfully requested.

The Examiner rejects claims 12, 25 and 26 for including the trademark "Java". Claims 12, 25 and 26 have been amended to overcome this rejection.

Section 102(e) Rejection:

The Examiner rejected claims 1-4, 8-17 and 21-28 under 35 U.S.C. § 102(e) as being anticipated by Roberts et al. (U.S. Patent 6,560,633) (hereinafter "Roberts"). Applicants respectfully traverse this rejection for at least the reasons below.

Regarding claim 1, Roberts fails to disclose receiving an address for a service within the distributed computing environment and linking the address to a pre-generated message interface for accessing the service, wherein the message interface <u>comprises computer-executable code built in to said device</u>, wherein the message interface is <u>constructed prior to runtime</u>. The Examiner relies upon Roberts' teachings regarding the web services architecture (WSA), citing column 4, lines 30 – 31 and lines 34 – 48 as well as column 5, lines 47-55. However, Roberts does not disclose linking an address to a pre-generated message interface that *is constructed prior to runtime*. Instead, Roberts teaches that the interfaces relied upon by the Examiner are downloaded from a web services engine and used by a client application (see, Roberts, column 4, line 60 – column 5, line 7, column 5, lines 19-30, and column 7, lines 10-33). Specifically, Roberts teaches a runtime model that "draws on the use of a number of web services that construct special user interface pages as output data" and that "[t]he behavior of these pages is to generate subsequent web service requests to the web services engine, and to call for the execution [of] action defined in a web services application session" (Roberts, column 4, line 67 – column 5, line 5). For example, Roberts describes that a web services request, "generates a response that takes the form of a graphical use interface to be displayed in a browser".

Interfaces that are downloaded and used by a client application are clearly different from a pre-generated message interface that includes code built in to a device

and that is constructed prior to runtime. The downloaded operation of Roberts relied on by the Examiner clearly occurs at runtime.

Thus, by teaching that web services interfaces are downloaded by client devices from a web services device at runtime, **Roberts teaches away** from a pre-generated message interface for accessing a service, where the message interface includes computer-executable code built in to the device and where the pre-generated message interface is constructed prior to runtime.

In the Response to Arguments, the Examiner refers to Roberts teachings regarding defined message interfaces that "were available for each service, converting requests and responses into appropriate formats for various services and applications, citing column 4, lines 27 – 30 and 37 – 38 of Roberts. However, the cited portions of Roberts describe a web services directory that contains the interfaces and "metadata about web services that have been published for use by web service consumers." Thus, these portions of Roberts are also described downloadable interface, not a pre-generated message interface including code built in to a device and that is constructed prior to runtime.

Applicants respectfully remind the Examiner that anticipation requires the presence in a single prior art reference disclosure of <u>each and every limitation</u> of the claimed invention, <u>arranged as in the claim</u>. M.P.E.P 2131; *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984). The <u>identical</u> invention must be shown <u>in as complete detail</u> as is contained in the claims. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). As discussed above, Roberts fails to disclose wherein the message interface <u>comprises computer-executable code built in to said device, wherein the message interface is constructed prior to runtime</u>. Therefore, Roberts cannot be said to anticipate claim 1.

The WSA interfaces of Roberts relied upon by the Examiner are clearly downloaded and therefore constructed at runtime, and thus cannot be said to anticipate

Applicants' claim. The rejection of claim 1 is not supported by the cited art and removal thereof is respectfully requested. Similar remarks also apply to claims 14 and 27.

Regarding claim 8, Roberts fails to disclose generating message endpoint code according to a schema defining messages for accessing a service, linking the message endpoint code <u>into executable operating code for the device</u> and <u>loading the message endpoint code and operating code</u> onto the device. The Examiner fails to cite any portion of Roberts that discloses linking message endpoint code, generated according to a schema defining messages for accessing a service, *into executable operating code* for a device and loading the message endpoint code and operating code onto the device. Instead, the Examiner merely relies upon Roberts' teachings regarding the web services architecture (WSA) generally, without providing any particular citation or interpretation that discloses *linking* message endpoint code *into executable operating code* for a device and loading the message endpoint code and operating code onto the device. For example, the Examiner cites column 5, lines 47-55, where Roberts describes that when a requester wants to run a WSA, an HTTP request is generated to run a "model-based" web service that has the responsibility of maintaining runtime models for WSAs. However, the cited passage makes not mention of linking message endpoint code into executable operating code for a device. Nor does the cited passage describe loading the message endpoint code and the operating code onto the device. Similarly, the remainder of the Examiner's cited passage, as well as of Roberts, fails to mention anything regarding linking message endpoint code into executable operating code for a device and loading the message endpoint code and the operating code onto the device.

Additionally, as noted above regarding claim 1, Roberts specifically teaches downloading WSA interfaces from web service devices for use on client devices to access WSAs. Downloading of message interface is clearly quite different from linking message endpoint code, generated according to a schema defining messages for accessing a service, *into executable operating code* for a device and loading the message endpoint

code and operating code onto the device. Thus, **Roberts teaches away** from Applicants' claim.

For at least the reasons above, the rejection of claim 8 is not supported by the cited art and removal thereof is respectfully requested. Similar remarks also apply to claims 21 and 28.

Applicants also assert that numerous ones of the dependent claims recite further distinctions over the cited art. However, since the rejection has been shown to be unsupported for the independent claims, a further discussion of the dependent claims is not necessary at this time.

Claims Objected To But Otherwise Allowable:

Claims 5-7 and 18-20 were objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form. However, Applicants submit that claims 5-7 and 18-20 are allowable in their current form for at least the reasons given above.
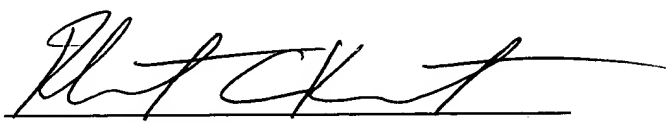
CONCLUSION

Applicants submit the application is in condition for allowance, and prompt notice to that effect is respectfully requested.

If any extension of time (under 37 C.F.R. § 1.136) is necessary to prevent the above-referenced application from becoming abandoned, Applicants hereby petition for such an extension. If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5181-66200/RCK.

Also enclosed herewith are the following items:

☒ Return Receipt Postcard
☐ Petition for Extension of Time
☐ Notice of Change of Address
☐ Other:

Respectfully submitted,

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Date: __May 30, 2006__